

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

CHRISTIAAN H. HIGHSMITH (CABN 296282)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-7234
christiaan.highsmith@usdoj.gov

Attorneys for the United States of America

FILED

Jul 25 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO.: 3:23-cr-00230 WHA
)	
Plaintiff,)	MOTION FOR SEALING ORDER
)	
v.)	UNDER SEAL
)	
JAIRO TOMAS SANTOS,)	
)	
Defendant.)	

The United States, by and through its counsel, Assistant United States Attorney CHRISTIAAN H. HIGHSMITH, moves this Court for an order sealing the government's application for a sealing order, the sealing order, the Indictment, the arrest warrant, and all attachments in the above-referenced investigation. Disclosure of the specified documents might jeopardize the defendant's arrest. The United States requests that the arrest warrant be unsealed after it has been executed.

Accordingly, the United States requests that the Court seal these documents, except that the Clerk of Court shall provide copies of the sealed documents to employees of the United States Attorney's Office. The United States further requests that the United States Attorney's Office be permitted to share these documents as necessary to comply with its discovery obligations, and with the

///

1 Federal Bureau of Investigation.

2
3 DATED: July 25, 2023

Respectfully submitted,

4 ISMAIL J. RAMSEY
5 United States Attorney

6 /s/ Christiaan H. Highsmith
7 CHRISTIAAN H. HIGHSMITH
8 Assistant United States Attorney
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28